

August 19, 2020



Genevieve Shiroma, Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 95814

Dear Commissioner Shiroma,

As you and your fellow Commissioners undertake important rulemaking around microgrids and resiliency (R.1909009), it is imperative that the urgent needs of California residents, businesses and communities are heard. During this time of a devastating public health pandemic and the ever-growing threat of wildfire, we need state leaders to prioritize policies that enhance access to clean power solutions like microgrids that enable essential businesses to operate around-the-clock.

The California Retailers Association is the only statewide trade association representing all segments of the retail industry, which currently operates over 418,840 retail establishments in California. Our members include general merchandise, department stores, mass merchandisers, restaurants, convenience stores, supermarkets and grocery stores, chain drug and specialty retail, hardware and home stores. These businesses and their employees are on the frontlines every day serving local communities and meeting critical needs.

By adopting a standardized, technology-neutral microgrid tariff, the Commission can enable the rapid development and deployment of clean, customer-owned power solutions that ensure safe, continuous power for California retailers. Given the cost of installing a microgrid is funded by the customer, policies should allow and encourage customized solutions for entities that want to invest in the solutions that work best for them and the communities they serve, especially in times of crisis. These customers also should not be penalized with fees for taking steps to ensure their own energy security and reliability. The grid has failed these customers too many times and their energy needs are too vital to be put at risk.

Resources that can independently provide 24/7/365 access to clean, reliable power – especially in the event of costly multi-day public safety power shutoff events – are more important than ever to ensuring that Californians' essential needs are met. As you consider rules for how microgrids and other resilience-enhancing energy solutions will be implemented in the state, we ask that you support immediate solutions that will help get more of these crucial resources installed for more customers more quickly.

Thank you for your consideration and your ongoing commitment to ensuring a safe and reliable energy future for our state.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rachel Michelin".

Rachel Michelin
President & CEO, California Retailers Association

cc. Marybel Batjer, President, California Public Utilities Commission
Martha Guzman-Aceves, Commissioner
Liane M. Randolph, Commissioner
Clifford Rechtschaffen, Commissioner